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FARABOW  
GARRETT &  
DUNNER LLP

901 New York Avenue, NW ■ Washington, DC 20001-4413 ■ 202.408.4000 ■ Fax 202.408.4400  
www.finnegan.com

John F. Hornick  
202.408.4076  
john.hornick@finnegan.com

April 25, 2006

Monte Cooper, Esq.  
Orrick, Herrington & Sutcliffe LLP  
1000 Marsh Road  
Menlo Park, CA 94025-1015

**VIA FACSIMILE**

Robert B. Hawk, Esq.  
Heller Ehrman, LLP  
275 Middlefield Road  
Menlo Park, CA 94025-3506

ConnectU LLC v. Mark Zuckerberg, et al., and THE FACEBOOK, INC.  
Civil Action No. 1:04-cv-11923 (DPW)

Dear Monte and Robert:

Regarding ConnectU's Interrogatory No. 16, Judge Collings' March 31, 2006 Order states that "[t]he plaintiffs may seek financial documents to determine the present value of TheFacebook, Inc. and thefacebook.com website." Such documents are within the scope of ConnectU's production requests identified below, and possibly others as well.

No. 71 (investors, investments, offers to purchase)  
No. 90 (fixed costs)  
No. 91 (variable costs)  
No. 92 (overhead)  
No. 93 (revenue)  
No. 94 (gross profit)  
No. 95 (net profit)  
No. 96 (tax returns)  
No. 97 (financial statements)  
No. 98 (bank accounts)  
No. 99 (tangible and intangible assets)  
No. 100 (debt)  
No. 101 (value of Facebook, Inc.)  
No. 106 (budgets, forecasts, and projections)  
No. 171 (value, estimated by or for each investor; and financial, revenue, profit or loss, and cash flow projections)

Monte Cooper, Esq.  
Robert B. Hawk, Esq.  
April 25, 2006  
Page 2

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In March and April of this year, the media reported that Facebook, Inc. and/or facebook.com were on the market for \$2 Billion, and that Viacom or some other entity offered to purchase Facebook, Inc. and/or facebook.com for \$750 Million (see, e.g., [http://money.cnn.com/2006/03/28/technology/pluggedin\\_fortune/index.htm](http://money.cnn.com/2006/03/28/technology/pluggedin_fortune/index.htm)). Just last week, the media reported that Facebook, Inc. and/or facebook.com have been valued at \$550 Million and that Greylock Partners, Meritech Capital Partners, and Peter Thiel are investing \$25 Million in Facebook, Inc. and/or facebook.com (see, e.g., <http://www.marketwatch.com/News/Story/Story.aspx?guid=%7BEAB41A61-A391-48CE-A20C-5254A5842493%7D&siteid=google> and <http://www.smh.com.au/news/Business/News-Corp-to-buy-into-job-search-engine/2006/04/19/1145344134351.html>). Such facts, and any related documents, are directly relevant to establishing the "present value of TheFacebook, Inc. and thefacebook.com website". Please produce immediately all documents related to these facts, and all current documents covered by the requests identified above. Examples of such documents are as follows (the existence of which are reflected in documents produced by Accel):

1. valuations of Facebook, Inc. and/or facebook.com prepared by or for investors or by Facebook, Inc. and/or facebook.com, including without limitation reports of consultants, experts, advisors, or appraisers that relate to the present value of Facebook, Inc. and/or facebook.com, in the possession, custody, or control of Facebook, Inc. and/or facebook.com or Saverin;
2. documents related to such investors' due diligence in the possession, custody, or control of Facebook, Inc. and/or facebook.com or Saverin;
3. the following Facebook, Inc. and/or facebook.com documents (from fourth quarter 2005 and 2006 to date):
  - a. profit and loss statements
  - b. balance sheets (audited and/or unaudited)
  - c. cash flow statements
  - d. income and/or financial statements
  - e. budgets
  - f. business plans
  - g. statements of stockholder equity

Monte Cooper, Esq.  
Robert B. Hawk, Esq.  
April 25, 2006  
Page 3

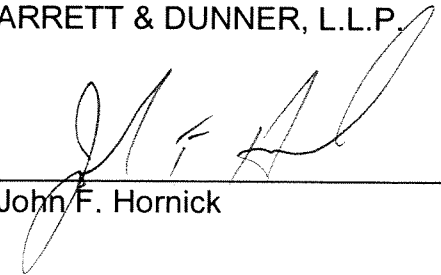
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4. any agreements related to such facts, such as:
  - a. stock purchase agreements
  - b. transaction agreements
  - c. investors rights agreements
  - d. right of first refusal and co-sale agreements
  - e. voting rights agreements
5. terms sheets summarizing the principal terms of any financing of TheFacebook, Inc. during 2006.

Absent Facebook Defendants' and Saverin's agreement to produce such documents, ConnectU will be forced to file a motion for contempt. Please provide a response to this letter by Thursday, April 27, 2006. Also, we wish to include a discussion of Facebook Defendants' and Saverin's production of such documents in the meet and confer requested by Facebook Defendants and scheduled for April 28, 2006.

Sincerely,

FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER, L.L.P.

By:   
John F. Hornick

JFH/sjb

cc: Daniel K. Hampton, Esq. (via facsimile)  
Steven M. Bauer, Esq. (via facsimile)  
Neel I. Chatterjee, Esq. (via facsimile)  
G. Hopkins Guy, III, Esq. (via facsimile)  
Gordon P. Katz, Esq. (via facsimile)  
Jeremy P. Oczek, Esq. (via facsimile)  
Bhanu K. Sadasivan, Esq. (via facsimile)  
Joshua H. Walker, Esq. (via facsimile)